

**REMARKS**

Claims 1-7 and 14-23 are pending in this application. By this Amendment, claims 4 and 20 are amended for clarity. No new matter is added.

**I. Objection To The Specification**

The Office Action objects to the specification under 35 C.F.R. §1.75(d)(1) and MPEP §608.01(o) and alleges that there is no support or antecedent basis in the specification for the claim 1 "unit"s.

The specification as filed recites various units at pages 4-9 and in the original claims. These recitations include descriptions of the linking information making device as comprising various units. The units of claim 1, for example, are disclosed at the top of page 4.

For the foregoing reasons, Applicants request withdrawal of the objection.

**II. The Claims Are Statutory**

The Office Action rejects claims 1, 14 and 17 under 35 U.S.C. §101 and alleges that claims 1, 14 and 17 are directed to non-statutory subject matter. Specifically, the Office Action alleges that the term "unit" recited in the claims is not supported by the specification, alleges that one of ordinary skill would have understood the recited "units" as software modules, and concludes on this basis that the claims are directed to software per se. Applicants respectfully traverse the rejection.

The specification as filed recites various units at pages 4-9 and in the original claims. These recitations include descriptions of the linking information making device as comprising various units. The specification further recites that the linking information making device includes an input device and a controller (see ninth aspect, page 10 of the specification as filed).

Further, the Office Action's assertion that one of ordinary skill would have interpreted "unit" as software is pure speculation. One of ordinary skill in the art, in general, would have understood the term "unit" as something that includes hardware, such as a computer and its

various constituent components. For example, according to the American Heritage College Dictionary, fourth edition, 2002, "unit" is defined in part as "1. An individual, group, structure, or other entity regarded as an elementary constituent of a whole. 2. A group regarded as a distinct entity within a larger group. 3a. A mechanical part or module. B. An entire apparatus or the equipment that performs a specific function ..."

Even if "unit" is deemed to be interpretable as pure software, the term "device" clearly has a mechanical connotation. One of ordinary skill would not refer to pure software as a "device". As independent claim 1 is directed to a device, thus, the claim is not directed to pure software, regardless of the interpretation of "unit".

For the foregoing reasons, Applicants request withdrawal of the rejection.

### **III. The Claims Are Patentable Over The Applied References**

The Office Action (1) rejects claims 1-7, 17-20 and 22-23 under 35 U.S.C. §103(a) over U.S. Patent Publication No. 2002/0198904 to Robles et al. (Robles) in view of U.S. Patent No. 6,407,820 to Hansen et al. (Hansen); and (2) rejects claims 14-16 and 21 under 35 U.S.C. §103(a) over Robles in view of Hansen, and further in view of U.S. Patent Publication No. 2004/0039647 to Roche. Applicants respectfully traverse the rejections.

Robles discloses a document production environment that includes production server 14, client computers 12, and production devices 16 (Fig. 1). A services database 38 on the server 14 stores data representing available services and service options (paragraph [0028]). A services engine 40 may obtain information directly from production devices 16 (*id.*). In operation, interface translator 36 displays a user interface that enables a user to select services and options for producing a production request (paragraph [0039], Fig. 10, step 84). Thereafter, the user selects the production device(s) 16 that are to perform the selected services and options from a list of available devices (paragraph [0039]).

Regarding independent claims 1-3, the Office Action acknowledges that Robles fails to disclose (1) "the linking information including information to be displayed on a screen of

one or more service processing devices and to be selected by a user operating the screen when the user instructs to start linking the predetermined processings" (emphasis added); and (2) the claimed management unit. Regarding independent claim 20, the Office Action further acknowledges that Robles fails to disclose the claimed steps of (3) "making linking information that links the processings to be executed by the service processing devices as a workflow based on a user operation on the display". The Office Action cites to Hansen as curing the deficiencies of Robles.

Hansen discloses a system for managing production printing workflow. In the sections cited by the Office Action, Hansen discloses (1) tickets that specify production output device instructions and parameters and which can be associated with a document to be produced to cause the document to be processed according to the ticket's instructions and parameters (col. 12, lines 28-61); and (2) that the management system can include open document management architecture (ODMA) support for interfacing with document libraries (col. 10, lines 16-24).

However, even if Robles is modified by Hansen, regarding independent claims 1-3, the proposed combination fails to disclose "the linking information including information to be displayed on a screen of one or more service processing devices and to be selected by a user operating the screen when the user instructs to start linking the predetermined processings" (emphasis added). Regarding independent claim 20, even if Robles is modified by Hansen, the applied references fail to disclose the step of "making linking information that links the processings to be executed by the service processing devices as a workflow based on a user operation on the display" (emphasis added).

While the Office Action cites to Hansen at col. 12, lines 28-61 as disclosing these features, the cited section discloses Hansen's tickets. Hansen's tickets do not correspond to information that is selected to start linking the predetermined processings because when a

user selects a ticket, the ticket defines processing to be performed on the document to which the ticket is associated. That is, the ticket does not link two or more processings, but instead, only defines processing to be performed on an associated document when the associated document is processed. Any processing other than that defined by a ticket is not linked by the ticket.

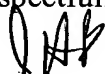
For the foregoing reasons, Applicants request withdrawal of the rejections.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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JAO:JHB/mab

Attachment:

Petition for Extension of Time

Date: December 16, 2008

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